

BRADLEY J. NASH (*admitted pro hac vice*)  
(bnash@cov.com)  
COVINGTON & BURLING LLP  
620 Eighth Avenue  
New York, NY 10018  
Tel.: (212) 841-1000  
Fax: (212) 841-1010

Attorneys for Plaintiff  
Roots Ready Made Garments Co. W.L.L.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ROOTS READY MADE GARMENTS CO.  
W.L.L.,

Plaintiff,

v.

THE GAP, INC., a/k/a, GAP, INC., GAP  
INTERNATIONAL SALES, INC., BANANA  
REPUBLIC, LLC, AND OLD NAVY, LLC,

Defendants.

Case No: C 07 3363 CRB

MISCELLANEOUS ADMINISTRATIVE  
REQUEST TO FILE DOCUMENTS  
UNDER SEAL; ~~[PROPOSED]~~ ORDER

Date: August 29, 2008  
Time: 10:00 a.m.  
Place: Courtroom 8, 19th Floor  
Judge: Charles R. Breyer

Pursuant to Local Rule 79-5(c), Roots Ready Made Garments Co., W.L.L.  
("Roots") hereby makes this Miscellaneous Administrative Request to File certain exhibits, and  
the portions of a document that refers to those exhibits ("the Documents"), Under Seal.

Plaintiff's Opposition to Defendants' Motion for Summary Judgment, or, in the  
Alternative, Summary Adjudication (the "Opposition Brief") refers to deposition transcripts and  
documents that Defendants have designated confidential under the terms of the Protective Order  
entered by the Court on August 7, 2007. The Opposition Brief also refers to deposition  
transcripts and documents that Roots has designated as confidential pursuant to the Protective

Order entered by the Court on August 7, 2007. These deposition transcripts and documents contain confidential business information, and Roots' business interests would be adversely affected if the contents of the Documents were revealed to third parties outside this litigation.

True and correct copies of the referenced pages of these transcripts are attached as Exhibits A, B, D, E, F, L, M, P, Q, R T, U and V to the Declaration of Bradley J. Nash in Support of Plaintiff's Opposition to Defendants Motion for Summary Judgment, or in the Alternative, Summary Adjudication (the "Nash Declaration.")

Because the deposition transcripts have been designated as "Confidential" pursuant to Protective Order entered by this Court on August 7, 2007, and contain confidential business information, Roots respectfully requests that:

(i) Exhibits A, B, D, E, F, L, M, P, Q, R T, U and V to the Nash Declaration be filed under seal and lodged in accordance with Civil Local Rule 79-5(c) and (d);

(ii) The sealed version of the Opposition Brief, which refers to the contents of the Documents, be lodged in accordance with Civil Local Rule 79-5(c) and (d).

Roots has also prepared a public version of the Opposition Brief and Declaration of Bradley J. Nash in support thereof, which will be filed electronically. In the public version, Roots has redacted only those portions that constitute or refer to the confidential material.

Respectfully submitted,

Dated: August 8, 2008

COVINGTON & BURLING LLP

/s/ Bradley J. Nash  
BRADLEY J. NASH

**IT IS SO ORDERED.**

Dated: August 11, 2008

BY: \_\_\_\_\_

